



MITIGATION PLAN

The goal of this mitigation plan is to compensate for the temporal loss of forested wetland functions in the project area. The proposed relocation will result in no net loss of ephemeral stream or wetland habitat. Specific mitigation objectives include: 1) to restore a diverse forested wetland habitat in the disturbed project area; and 2) to maintain stability over any exposed/impacted surface areas in the relocated stream and restored wooded wetland. The plan's reliance on existing natural features and wetland conditions makes it viable with a high likelihood for success. Proposed compensation for the unavoidable temporal impacts to jurisdictional wooded wetlands will be provided through forested wetland restoration activities that include a combination of groundcover seeding and tree/shrub planting as outlined below.

GROUNDCOVER SEEDING

Construction activity will involve clearing of vegetation from an approximately 20-foot wide corridor of forested wetland along the existing railroad ditch. Topsoil (upper four to six inches) will be removed and stockpiled. The new stream channel will be excavated, and the material will be placed directly in the existing stream. Once excavation and grading are complete, topsoil will be placed on the surface of the former stream to an elevation that matches existing adjacent forested wetlands. Following completion of construction activities and final topsoil placement, the exposed soil surfaces will be seeded with a native groundcover seed mix at a rate of 50 pounds per acre. An additional 50 pounds per acre of an annual cover species such as annual rye or oats will also be planted to promote rapid vegetation establishment and stabilization of the site. The groundcover seed mix will include a minimum of ten species from the following list.

If the seed cannot be drilled, the following steps will be undertaken for broadcast seeding. The exposed surface will be disked to prepare a loose seed bed prior to seeding. Following seeding, the site will be rolled with a cultipacker to promote seed/soil contact. The site will then be mulched with clean straw and crimped to hold the mulch in place. If necessary due to site or weather conditions, erosion control matting may be used to stabilize the new stream channel sideslopes.

Scientific Name	Common Name	Wetland Status ¹	
Alisma subcordatum	Water Plantain	OBL	
Alopecurus pratensis	Meadow Foxtail	FACW	
Aster puniceus	Purple-Stemmed Aster	OBL	
Bidens frondosa	Beggar Ticks	FACW	
Carex comosa	Bristly Sedge	OBL	
Carex crinita	Fringed Sedge	OBL	
Carex lupulina	Hop Sedge	OBL	
Carex vulpinoidea	Fox Sedge OBL		
Chelone glabra	Turtiehead	OBL	
Elymus riparius	Riverbank Wild Rye	FACW	
Elymus virginicus	Virginia Wild Rye	FACW-	
Eupatorium perfoliatum	Common Boneset	FACW	
Glyceria striata	Fowl Manna Grass	OBL	
Helenium autumnale	Sneezeweed	FACW	
Juncus effuses	Soft Rush	FACW	
Leersia oryzoides	Rice Cutgrass	OBL	
Ludwigia alternifolia	Seedbox FACW		
Mimulus ringens	Monkey Flower	OBL	
Poa palustris	Fowl Bluegrass	FACW	
Scirpus acutus	Hard-Stem Bulrush	OBL	
Scirpus atrovirens	Green Bulrush OBL		
Scirpus cyperinus	Wool Grass FACW		
Scirpus validus	Soft-Stem Bulrush	OBL	
Solidago gigantea	Smooth Goldenrod FACW		
Solidago patula	Rough-Leaved Goldenrod OBL		
Solidago riddellii	Riddell's Goldenrod OBL		
Sparganium eurycarpum	Giant Bur-Reed OBL		
Verbena hastata	Blue Vervain FACW		
Vernonia noveboracensis	New York Ironweed	FACW	

¹ FACW = Facultative wetland; OBL = Obligate wetland (Reed, 1988)

Stream relocation and follow-up restoration activities will be initiated in the first appropriate season following approval of the required permits. Grading/construction activities will be scheduled to coincide with drier conditions (likely late summer or fall). Seeding of native groundcover will be accomplished immediately after completion of grading activities.

No evidence of the invasive exotic species reed canary grass (*Phalaris arundinacea*), common reed (*Phragmites australis*), purple loosestrife (*Lythrum salicaria*), or narrow-leaved cattail (*Typha angustifolia*) were observed on site. Measures to avoid importing exotic species include using topsoil present at the site (not importing from other unknown wetland sites that could have exotic species root stocks or seeds) and purchasing seed mixtures and live seedlings from reputable native species nurseries that control for exotics in their seed mixes and packing materials.

TREE/SHRUB PLANTING

Following the completion of construction activities and groundcover seeding, native three-gallon RPM (Root Production Method) containerized trees will be planted across the filled former stream area at a rate of 100 stems per acre. A minimum of six species will be selected from the following list, and will include at least four canopy tree species and two non-canopy tree or shrub species. Other native species may be substituted based on availability. Tree/shrub planting will be completed in the dormant season (December to March).

Scientific Name	Common Name	Growth Habit	Wetland Status ¹
Acer rubrum	Red Maple	Non-Canopy Tree	FAC
Aesculus glabra	Ohio Buckeye	Non-Canopy Tree	FAC
Amorpha fruticosa	Indigobush	Shrub	FACW
Asimina triloba	Common Paw Paw	Non-Canopy Tree	FAC
Betula nigra	River Birch	Non-Canopy Tree	FACW
Carpinus caroliniana	Ironwood	Non-Canopy Tree	FAC
Carya laciniosa	Shellbark Hickory	Canopy Tree	FACW
Cornus racemosa	Gray Dogwood	Shrub	FACW
Nyssa sylvatica	Black Gum	Canopy Tree	FAC
Physocarpus opulifolius	Common Ninebark	Shrub	FACW
Quercus bicolor	Swamp White Oak	Canopy Tree	FACW
Quercus lyrata	Overcup Oak	Canopy Tree	OBL
Quercus michauxii	Swamp Chestnut Oak	Canopy Tree	FACW
Quercus palustris	Pin Oak	Canopy Tree	FACW
Quercus shumardii	Shumard Oak	Canopy Tree	FACW
Sambucus canadensis	Elderberry	Shrub	FACW

FAC = Facultative; FACW = Facultative wetland; OBL = Obligate wetland (Reed, 1988)

REVISED PROJECT DRAWINGS

The permit deficiency letter indicates that design drawings must be submitted on 8.5×11 inch sheets. The original Site Plan Drawings have been reduced in size and are attached. They can be provided electronically if required.

SUMMARY

The proposed project will result in the relocation of an ephemeral stream to contain contamination, as part of a required remedial action approved by IDEM hazardous waste and emergency response personnel. Temporal impacts to forested wetland will occur; however, no net loss of jurisdictional area will occur. Approximately 800 feet (0.37 acre) of an existing ephemeral stream will be relocated approximately 20 feet east through an approximately 0.36-acre cleared forested

wetland corridor. As compensation for this impact, forested wetland habitat will be re-established on the former stream following construction through a combination of native groundcover seeding, and native wetland tree/shrub planting.

We trust that this additional information will allow you to proceed with review and issuance of Section 401 water quality certification for the project. Please contact Ron Thomas of Redwing at (502) 625-3009 or Tim DeWitt of August Mack at (317) 916-3161 with any questions regarding this addendum or the overall project.